

I/S 21  
Days

3/6/14

CENTRAL DISTRICT OF CALIFORNIA  
BY: CS DEPUTY

1 OMAR SHAKUR  
2 408 S. PACIFIC AVENUE  
3  
4 GLENDALE, CA 91204  
5 (818) 392 9731

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FILED  
U.S. DISTRICT COURT  
CENTRAL DIST. OF CALIF.  
LOS ANGELES  
FEB 28 PM 1:18

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

OMAR SHAKUR

Plaintiff,

VS.

EOS CCA

**DEFENDANT(S).**

**CV14-1527** MMM (MRWx)  
Case No.

**COMPLAINT FOR:**

FAIR DEBT COLLECTION

FAIR CREDIT  
REPORTING ACT

ROSENTHAL ACT

**Jury Trial Demanded: Yes**

**I. JURISDICTION**

1. This Court has jurisdiction under: 15 U.S.C. sec. 1692 k (d), 15 U.S.C.  
sec. 1681(p)(b), and 28 U.S.C. sec. 1331,1337

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## II. VENUE

2. Venue is proper pursuant to: 28 U.S.C. sec. 1391(b) where the acts and transaction giving rise to plaintiff's action occurred in the district, where plaintiff resides in this district, and / or where defendant transact business in this district.

## III. PARTIES

3. Plaintiff's name is: Omar Shakur Plaintiff resided at: 408 S. Pacific Ave. Glendale, California 91204. Is a consumer within the meaning of 15 U.S.C. sec. 1692 a (3), 15 U.S.C. § 1681 a (c).

4. Defendant: EOS CCA is a "debt collector" within the meaning of 15 U.S.C. sec 1692 a (6).

#### IV. STATEMENT OF FACTS

5. Comes now Omar Shakur who does hereby file this complaint for damages of 15 U.S.C. sec. 1692, et seq. (FDCPA) and the California Rosenthal Act, Civil Code sec. 1788 et seq. 15 U.S.C. sec. 1681 et seq. (FCRA) based upon defendant(s) violations of the Fair Debt Collection Practices Act, Rosenthal Act and Fair Credit Reporting Act.

6. Plaintiff obtained his consumer reports from the three major credit reporting agencies and found entries by entities that he was unfamiliar with in the report. Plaintiff found after examination of his Experian, Transunion consumer credit reports that defendant EOS CCA had obtained Plaintiff consumer credit reports on August 21, 2013 and has continuously reported to date.

7. Experian, Transunion, Equifax, is a credit reporting agency within the meaning FCRA 15 U.S.C. 1681a (f).

8. Consumer credit report is a consumer report within the meaning of the FCRA 15 U.S.C. sec. 1681a (d).

9. The FCRA 15 U.S.C. sec. 1681b defines the permissible purposes for

1 which a person may obtain a consumer credit report. As to the Defendant first  
2 inquiry pull, the Plaintiff is/ was not at any given time involved in the any  
3 related underlying credit transaction. Plaintiff has not at any given time initiated  
4 the any transaction, nor has Plaintiff participated in the any transaction in writing  
5 or otherwise.  
6

7  
8 10. Defendants regularly engaged as furnishers of consumers Experian,  
9 Transunion, credit file, such permissible purposes as defined by 15  
10 U.S.C. § 1681b are generally if the consumer makes application for credit, makes  
11 application for employment, for underwriting of insurance involving the  
12 consumer, or is offered a bonafide offer of credit as a result of the inquiry.  
13  
14

15  
16 11. Plaintiff has never had any business dealings or any accounts with made  
17 application for credit from, made application for employment with, applied for  
18 insurance from or received a bonafide offer of credit from the defendant that  
19 constitute a any contract  
20  
21

22 12. On August 21, 2013 Defendant EOS CCA obtained the plaintiff  
23 consumer credit reports without consent in violation of the FCRA 15 U.S.C. sec.  
24 1681b. Defendant failure to conduct an investigation properly of the November  
25 22, 2013 dispute from the Experian, Transunion credit Bureau and take any  
26 remedial actions of the November 22, 2013 reinvestigation procedure  
27  
28

1 under § 1681s-2(b) after notification of Plaintiff dispute; Said actions by  
2 defendant holds liable in favor to Plaintiff reward/relief damages as a matter of  
3 law plaintiff Experian & Transunion, record thereby reducing plaintiff credit  
4 score, and loss of societal pleasures.  
5

6  
7  
8 13. On December 1, 2013, and February 22, 2014 Plaintiff  
9 sent via United States Postal Service Certified Mail a letter requesting formal  
10 debt validation/ illegal inquiry pull. This was in an effort to  
11 mitigate damages in obtaining Plaintiff's credit report before taking civil action  
12 in accordance with (FDCPA) 15 U.S.C. sec. 1692g,. Plaintiff notice  
13 included defendants violations of the (FCRA) 15 U.S.C. sec. 1681b. A  
14  
15

16  
17  
18 14. On March 03, 2014 Plaintiff has received no correspondence to  
19 said notices sent to Defendant. The actions of the Defendant obtaining consumer  
20 credit report with no validation for permissible purposes or contract bearing  
21 signature between defendant and plaintiff consent, are clear and willful  
22 violations of FCRA, 15 U.S.C. § 1681b and an illegal practices against  
23 Plaintiff's right to privacy.  
24  
25

26  
27 15. Plaintiff disputed with (3) credit reporting agency's from the month of  
28 September 2013 and February 2014. Defendant at no time has communicated

1 with Plaintiff what justification they may have had by obtaining Plaintiff credit  
 2 profile. Plaintiff have given ample opportunity for Defendant to justify their  
 3 action, the December 1, 2013 sent letter the February 22, 2014 second notice  
 4 letter upon 10 day response. Defendant has failed to respond to said notice.  
 5

6  
 7  
 8 16. Plaintiff discovery of violations brought forth herein occurred in  
 9 August 2013 and are within the statute of limitations as defined in the FCRA,  
 10 15 U.S.C. sec.1681p FDCPA 15 U.S.C. sec. 1692k (d).  
 11

## 12 13 **V. CAUSES OF ACTION**

### 14 15 **FIRST CAUSE OF ACTION**

16 Violations of FDCPA 15 U.S.C. 1692 e,f,g

17  
 18 **(As against Defendant(s): EOS CCA.**

19 17. Plaintiff re-alleges and incorporates paragraphs 5-16. Plaintiff is a  
 20 Consumer within the meaning of the FDCPA 15 U.S.C. sec. 1692a(3)  
 21 EOS CCA are debt collectors within the meaning of  
 22 FDCPA 15 U.S.C. sec 1692a(6).  
 23

24  
 25 18. Plaintiff re-alleges and incorporates paragraph 5-16. Based on the  
 26 foregoing consumer credit reports. The Defendant Is violating FDCPA and  
 27 FCRA violations include but are not limited to the following: EOS CCA violated  
 28



1  
2 15 U.S.C. sec. 1692e(10) by the use of any false representation or deceptive  
3 means to collect or attempt to collect any debt or to  
4 obtain information concerning consumer.  
5

6  
7 19. Plaintiff re-alleges and incorporates paragraph 5-16. EOS CCA  
8 violated 15 U.S.C. sec. 1692d by engaging in conduct the natural  
9 consequences of which is to harass, oppress, or abuse any person.  
10  
11

12  
13 **SECOND CAUSE OF ACTION**  
14

15 Violation of FCRA 15 U.S.C. SEC. 1681 b

16 **As against Defendant(s): EOS CCA**  
17

18 20. Plaintiff re-alleges and incorporates paragraph 5-16. Plaintiff is a  
19 consumer within the meaning of the FCRA 15 U.S.C. sec. 1681a (c).  
20 EOS CCA is a furnisher of information within the meaning  
21 of the FCRA 15 U.S.C. sec. 1681 s-2  
22  
23

24 21. Plaintiff re-alleges and incorporates paragraph 5-16. Plaintiff did not  
25 Initiate a firm offer of credit (loan, credit card) with defendant. Plaintiff did not  
26 Initiate firm offer of insurance with defendant. Plaintiff did not initiate  
27 employment with defendant. Defendant was not directed by a court order to pull  
28

1 plaintiff consumer report. Defendant is no gov't agency under USA Patriot Act  
2  
3 reply: UNITED STATES v. McNeil 362 F.3d 570 "9<sup>th</sup> Circuit Court of Appeals"  
4

5 22. Plaintiff re-alleges and incorporates paragraph 5-16. Based on the  
6 foregoing consumer credit report. Defendant willfully violated the FCRA.  
7 Defendant violations include, but are not limited to the following: EOS CCA  
8 willfully violated 15 U.S.C. sec. 1681b(f) by obtaining plaintiff consumer report  
9 without a permissible purpose as defined by 15 U.S.C. sec. 1681b  
10  
11

### 12 **THIRD CAUSE OF ACTION**

13 Violation Civil Liabilities for non-compliance 15 U.S.C. sec. 1681 o, n  
14

15 **(As against Defendant(s): EOS CCA**  
16

17 23. Plaintiff re-alleges and incorporates paragraph 5 -16. Plaintiff is a  
18 consumer within the meaning of the FCRA 15 U.S.C. sec. 1681a (c).  
19 EOS CCA is a furnisher of information within the meaning  
20 of the FCRA 15 U.S.C. sec. 1681 s-2  
21

22  
23 24. Plaintiff re-alleges and incorporates paragraph 5-16.  
24 EOS CCA willful procuring or causing to be procured an  
25 investigative consumer report without clearly and accurately disclosing to  
26 plaintiff that the report had been requested.  
27  
28



1  
2 25. Plaintiff re-alleges and incorporates paragraph 5-16. EOS CCA without  
3 informing plaintiff of the right to request disclosure in violation 15  
4 U.S.C. sec 1681d q. Actions on the part of defendant demonstrates a  
5  
6 willful disregard for federal law and constitutes a blatant attempt to injure or  
7  
8 ruin the credit rating of plaintiff since defendant has demonstrated an inability  
9  
10 to validate the alleged debt and subsequently attempted coerce payment. 15  
11 U.S.C sec. 1681 n

## 12 **V. REQUEST FOR RELIEF**

13  
14 29. That this court grant judgement against defendant for first claim for relief  
15  
16 1) Actual damages determined by jury 2.) Punitive & Statutory damages 15  
17 U.S.C. sec. 1692 d (1) 1692 f (6) Remedies 1692 k, Rosenthal Act \$1,000.00 per  
18  
19 statute 3.) legal cost and fees. 4.) Any relief as the court see fit.

20  
21 30. That this court grants judgement against defendant  
22  
23 for: second claim for relief 1.) Actual damages to be  
24  
25 determined by jury 2.) Punitive and Statutory damages FCRA 15 U.S.C. sec.  
26  
27 1681b \$1000.00 3.) court fees and cost 4.) Any relief as court see fit.  
28

1  
2 31. That this court grants judgment against Defendants for: Third claim for  
3 relief 1.) Actual damages to be determined by jury 2.) punitive & statutory  
4 damages pursuant 15 U.S.C. sec 1681o \$1,000.00 3.) court fees and cost.  
5  
6 4.) Any relief as court sees fit.

7  
8  
9  
10  
11  
12  
13 Date: 2/28/2014

14 Sign: 

15 Print Name: Omar Shokar  
16  
17

18 **DEMAND FOR JURY TRIAL**

19 Plaintiff hereby request a jury trial on all issues raised in this complaint  
20  
21

22 Date: 2/28/2014

23 Sign: 

24 Print Name: Omar Shokar  
25  
26  
27  
28

GRIFFITH STATION  
 LOS ANGELES, California  
 900399998  
 0545300039 -0097  
 (800)275-8777 10:44:36 AM  
 11/22/2013

Product Description	Sale Qty	Unit Price	Final Price
ATLANTA GA 30374 Zone-8			\$0.46

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 0.80 oz.  
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 Label #: 70111150000118863777  
 Issue PVI: \$3.10  
 \$3.56

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 Scheduled Delivery Day: Mon 11/25/13  
 @@ Certified  
 Label #: 70111150000118863753  
 Issue PVI: \$3.10  
 \$3.56

CRUM LYNNE PA 19022 Zone-8  
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 Scheduled Delivery Day: Mon 11/25/13  
 @@ Certified  
 Label #: 70111150000118863746  
 Issue PVI: \$3.10  
 \$3.56

Total: \$10.68

Paid by:  
 Debit Card \$10.68  
 Account #: XXXXXXXXXXXX9874  
 Approval #: 154745  
 Transaction #: 243  
 23 903200400  
 Receipt #: 004575

@@ For tracking or inquiries go to  
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Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	\$3.56

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 NOV 22 2013  
 Postmark  
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 11/22/2013

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 or PO Box No. *EXPRIAN*  
 City, State, ZIP+4 *P.O. Box 2002*  
*Allen TX 75013*

PS Form 3800, August 2006

See Reverse for Instructions

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Certified Fee		\$3.10
Return Receipt Fee (Endorsement Required)		\$0.00
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	\$3.56

0039  
 02  
 NOV 22 2013  
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 11/22/2013

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 Street, Apt. No.,  
 or PO Box No. *TRANS UNION*  
 City, State, ZIP+4 *P.O. Box 2000*  
*Chester PA 19022-2000*

PS Form 3800, August 2006

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ATLANTA GA 30374

**OFFICIAL USE**

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Certified Fee		\$3.10
Return Receipt Fee (Endorsement Required)		\$0.00
Restricted Delivery Fee (Endorsement Required)		\$0.00
Total Postage & Fees	\$	\$3.56

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 NOV 22 2013  
 Postmark  
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 11/22/2013

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 Street, Apt. No.,  
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 City, State, ZIP+4 *P.O. Box 740256*  
*ATLANTA GA 30374-0256*

PS Form 3800, August 2006

See Reverse for Instructions

Copy

Certified mail # 7011 1150 0001 1888 6707

Omar Shakur  
408 S.Pacific Avenue  
Glendale, Ca [91204]  
818 392 9731

EOS CCA  
700 LONGWATER DRIVE  
NORWELL, MA 02061

DECEMBER 1, 2013

Re: Unauthorized Credit Inquiry

To Whom It May Concern:

I recently received a copy of my credit report. The credit report showed a credit inquiry 08/21/2013 by your company that I do not recall authorizing. I understand that you shouldn't be allowed to put an inquiry on my file unless I have authorized it. Please have this inquiry removed from my credit file because it is making it very difficult for me to acquire credit.

I have sent this letter certified mail because I need your prompt response to this issue. Please be so kind as to forward me documentation that you have had the unauthorized inquiry removed.

If you find that I am remiss, and you do have my authorization to inquire into my credit report, then please send me proof of this.

Thanking you in advance,

*Omar Shakur*  
(without prejudice)

Certified Mail # 7011 1150 0001 1886 4941

Omar Shakur  
408 S.Pacific Avenue  
Glendale, Ca [91204]  
818 392 9731

EOS CCA  
700 LONGWATER DRIVE  
NORWELL, MA 02061

FEBRUARY 1, 2013

Re: Unauthorized Credit Inquiry

To Whom It May Concern:

I have previously sent you a request to validate the unauthorized credit pull inquiry on August 21, 2013 under the Fair Credit Reporting Act also Fair Debt Collection Practices Act and I have yet to hear from you regarding this matter. I feel as though I have given your organization ample time to resolve this questionable inquiry. The credit report showed a credit inquiry by your company that I do not recall authorizing. I understand that you shouldn't be allowed to put an inquiry on my file unless I have authorized it. Please have this inquiry removed from my credit file because it is making it very difficult for me to acquire credit.

I have sent this letter certified mail because I need your prompt response to this issue. Please be so kind as to forward me documentation that you have had the unauthorized inquiry removed.

If you find that I am remiss, and you do have my authorization to inquire into my credit report, then please send me proof of this.

Thanking you in advance,

*Omar Shakur*  
(without prejudice)



For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® Postmark on your Certified Mail receipt is required.

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Return Receipt Fee (Endorsement Required)	\$	0.00
Restricted Delivery Fee (Endorsement Required)	\$	0.00
Total Postage & Fees	\$	3.10

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Sent to **EOS CCA**  
 Street Apt. No. or PO Box No. **700 Longwater Drive**  
 City, State, ZIP+4 **Norwell, MA 02061**  
 PS Form 3800, August 2006 See Reverse for Instructions

**NORWELL MA 02061 Zone-8**  
 First-Class Mail Letter  
 0.40 oz.  
 Scheduled Delivery Day: Mon 12/09  
 @ Certified  
 Label #: 7011115000011886721  
 Issue PVI: \$0.46

**ORLANDO FL 32896 Zone-8**  
 First-Class Mail Letter  
 0.40 oz.  
 Scheduled Delivery Day: Mon 12/09/13  
 @ Certified  
 Label #: 7011115000011886721  
 Issue PVI: \$3.10

**DES MOINES IA 50306 Zone-7**  
 First-Class Mail Letter  
 0.30 oz.  
 Scheduled Delivery Day: Mon 12/09/13  
 @ Certified  
 Label #: 70111150000118863807  
 Issue PVI: \$3.56

**CARROLLTON TX 75007 Zone-6**  
 First-Class Mail Letter  
 0.30 oz.  
 Scheduled Delivery Day: Mon 12/09/13  
 @ Certified  
 Label #: 70111150000118863807  
 Issue PVI: \$0.46

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Postage	\$	10.49
Certified Fee	\$	3.30
Return Receipt Fee (Endorsement Required)	\$	0.00
Restricted Delivery Fee (Endorsement Required)	\$	0.00
Total Postage & Fees	\$	13.79

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 02/22/2014

Sent to **EOS CCA**  
 Street Apt. No. or PO Box No. **700 Longwater Drive**  
 City, State, ZIP+4 **Norwell, MA 02061**  
 PS Form 3800, August 2006 See Reverse for Instructions

**NORWELL MA 02061 Zone-8**  
 First-Class Mail Letter  
 0.20 oz.  
 Expected Delivery: Tue 02/25/14  
 @ Certified  
 USPS Certified Mail #: 70111150000118864941  
 Issue PVI: \$3.79

**ORLANDO FL 32896 Zone-8**  
 First-Class Mail Letter  
 0.30 oz.  
 Expected Delivery: Tue 02/25/14  
 @ Certified  
 USPS Certified Mail #: 70111150000118864958  
 Issue PVI: \$3.30

**DES MOINES IA 50306 Zone-7**  
 First-Class Mail Letter  
 0.30 oz.  
 Expected Delivery: Tue 02/25/14  
 @ Certified  
 USPS Certified Mail #: 70111150000118864958  
 Issue PVI: \$3.79

**CARROLLTON TX 75007 Zone-6**  
 First-Class Mail Letter  
 0.30 oz.  
 Expected Delivery: Tue 02/25/14  
 @ Certified  
 USPS Certified Mail #: 70111150000118864958  
 Issue PVI: \$11.37



I. (a) PLAINTIFFS (Check box if you are representing yourself ☒)

Omar Shakur

DEFENDANTS (Check box if you are representing yourself ☐)

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

408. S. Pacific Ave (818) 392 9731  
Glendale, CA 91204

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1. U.S. Government Plaintiff  
☒ 3. Federal Question (U.S. Government Not a Party)  
☐ 2. U.S. Government Defendant  
☐ 4. Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES-For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant)

- |   |   |                                |   |                                |                                       |
|---|---|--------------------------------|---|--------------------------------|---------------------------------------|
| Citizen of This State                   | PTF <input checked="" type="checkbox"/> 1 | DEF <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State     | PTF <input type="checkbox"/> 4 | DEF <input type="checkbox"/> 4        |
| Citizen of Another State                | <input type="checkbox"/> 2                | <input type="checkbox"/> 2     | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5     | <input checked="" type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3                | <input type="checkbox"/> 3     | Foreign Nation  | <input type="checkbox"/> 6     | <input type="checkbox"/> 6            |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1. Original Proceeding  
☐ 2. Removed from State Court  
☐ 3. Remanded from Appellate Court  
☐ 4. Reinstated or Reopened  
☐ 5. Transferred from Another District (Specify)  
☐ 6. Multi-District Litigation

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check "Yes" only if demanded in complaint.)CLASS ACTION under F.R.Cv.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$ 15,000

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Cal. FCRA, FDCPA Violations

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	REAL PROPERTY CONT.	IMMIGRATION	PRISONER PETITIONS	PROPERTY RIGHTS
<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/Etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced & Corrupt Org. <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Admin. Procedures Act/Review of Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Vet.) <input type="checkbox"/> 153 Recovery of Overpayment of Vet. Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment	<input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property <b>TORTS</b> <b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	<input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions <b>TORTS</b> <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability <b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 American with Disabilities-Employment <input type="checkbox"/> 446 American with Disabilities-Other <input type="checkbox"/> 448 Education	<b>Habeas Corpus:</b> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee Conditions of Confinement <b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Ret. Inc. Security Act	<input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405 (g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405 (g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number:

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AFTER COMPLETING PAGE 1 OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED ON PAGE 2.

## UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA

## CIVIL COVER SHEET

**VIII(a). IDENTICAL CASES:** Has this action been previously filed in this court and dismissed, remanded or closed? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**VIII(b). RELATED CASES:** Have any cases been previously filed in this court that are related to the present case? ☒ NO ☐ YES

If yes, list case number(s): \_\_\_\_\_

**Civil cases are deemed related if a previously filed case and the present case:**

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
- ☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
- ☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
- ☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

**IX. VENUE:** (When completing the following information, use an additional sheet if necessary.)

(a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named plaintiff resides.

☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

(b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** named defendant resides.

☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Noewell, MA

(c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which **EACH** claim arose.

**NOTE: In land condemnation cases, use the location of the tract of land involved.**

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles County	

\*Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

**Note:** In land condemnation cases, use the location of the tract of land involved

**X. SIGNATURE OF ATTORNEY (OR SELF-REPRESENTED LITIGANT):** Quoc Shih DATE: 2/28/2014

**Notice to Counsel/Parties:** The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet).

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405 (g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405 (g))